REMARKS

Status Summary

Claims 1-7 and 11-23 are pending in the present application. In this amendment, no claims have been canceled, and no new claims have been added. Therefore, upon entry of this amendment, claims 1-7 and 11-23 remain pending.

Claim Rejection - 35 U.S.C. § 103

Claims 1, 2, 5-7, 15-17, 20, and 21 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2005/0058061 to Shaffer et al., (hereinafter, "Shaffer") in view of U.S. Patent No. 7,286,545 to Tester et al., (hereinafter, "Tester"), U.S. Patent Application Publication No. 2004/0063499 to Schneider et al., (hereinafter, "Schneider"), and U.S. Patent No. 6,640,251 to Wiget et al., (hereinafter, "Wiget"). This rejection is respectfully traversed.

Applicants recognize that section 1 of the Official Action rejects independent claims 22 and 23 in view of the combination of Shaffer, Tester, Schneider, and Wiget but does not specifically address these claims until section 7. Specifically, section 7 of the Official Action rejects independent claims 22 and 23 under 35 U.S.C. § 103(a) in view of the combination of Shaffer, Tester, Schneider, Wiget, Westfall, and Chien. Applicants believe that the rejection of claims 22 and 23 under section 1 may be a typographical error and have thus addressed the rejection of claims 22 and 23 with regard to section 7 of the Official Action.

Independent claim 1 recites a multi-site redundant telephony call processing system that comprises an active telephony call processing host located in a first

geographic region for controlling calls between telephony subscribers and a standby telephony call processing host located in a second geographic region remote from the first geographic region for taking over call control functions handled by the active telephony call processing host in response to failure of the active telephony call processing host, the active and standby call processing hosts forming a single logical telephony call processing node. The system of claim 1 also includes a first local area network (LAN) including a first LAN segment and a second LAN segment being geographically distributed between the first and second geographic regions for carrying signaling messages to and from the active and standby telephony call processing hosts, wherein the first LAN is bridged over a wide area network (WAN) by interconnecting the first LAN segment located in the first geographic region with the second LAN segment located in the second geographic region. The system further includes a second LAN including a first LAN segment located in the second geographic region and a second segment located in the first geographic region, wherein the second LAN is a redundant LAN with respect to the first LAN, and wherein each of the first LAN and the second LAN respectively includes a single IP subnet.

Claim 1 has been amended to recite that the active telephony call processing host is connected to both the first segment of the first LAN in the first geographic region and the first segment of the second LAN in the first geographic region and that the standby telephony call processing host is connected to both the second segment of the first LAN in the second geographic region and the second segment of the second LAN in the second geographic region. Support for this amendment is found, for example, on

page 9, lines 1-4 of the present specification which states that host **100** and host **104** are interconnected via two LANs, LAN 1 and LAN 2. Additional support is also found in Figure 1 of the present application. Applicants respectfully submit that the combination of Shaffer, Tester, Schneider and Wiget fails to teach or suggest that both the active telephony call processing host and standby telephony call processing host are connected to both the first LAN and the second LAN in the manner recited in amended claim 1.

Shaffer instead discloses a telecommunications system that includes a single LAN **101** that is coupled to a variety of H.323 terminals **102a**, **102b**, a primary H.323 gatekeeper **108a**, a secondary H.323 gatekeeper **108b**, and a number of other devices. Applicants submit that the only LAN disclosed in Shaffer is LAN **101**. Notably, there is absolutely no teaching or suggestion in Shaffer of the primary and secondary gatekeepers being connected to a redundant LAN of any kind, much less being connected to a first LAN and a second LAN.

In section 2, the Official Action indicates that Shaffer does not specifically disclose that the processing hosts are geographically distributed. In an attempt to overcome the substantial gap existing between claim 1 and Shaffer, the Official Action introduces Tester which discloses that backup call servers are assigned to geographically disparate locations within a packet network. However, applicants respectfully submit that Tester fails to make any teaching or suggestion that the backup call servers are connected via a LAN of any type. Furthermore, it is submitted that Tester does not teach or suggest an active telephony call processing host that is

connected to both the first segment of the first LAN in the first geographic region and the first segment of the second LAN in the first geographic region and a standby telephony call processing host that is connected to both the second segment of the first LAN in the second geographic region and the second segment of the second LAN in the second geographic region as recited in amended claim 1.

Section 3 of the Official Action states that Shaffer in view of Tester does not disclose a LAN connecting the call processing hosts via a LAN bridged over a WAN. In an attempt to overcome this substantial gap existing between claim 1 and Shaffer in view of Tester, the Official Action introduces Schneider to disclose geographically distributed servers connected to respective LANs bridged by a WAN. Applicants respectfully disagree and submit that Schneider instead discloses a single WAN **12** that serves to connect a plurality of separate and distinct LANs **18A-E**. Applicants submit that while Schneider may disclose that WAN **12** serves to connect the individual LANs **18A-E**, there is simply no teaching or suggestion in Schneider that any of the LANs disclosed provide backup or are redundant with respect to each other. Further, not one of the LANs disclosed in Schneider is geographically distributed (i.e., has two segments as recited in amended claim 1). Although the LANs disclosed in Schneider are positioned at different and separate casinos, each of the disclosed LANs is a single, separate LAN that is centrally located within each casino (i.e., not geographically distributed between two areas) and includes its own slave server **26**. Notably, each slave server **26** is connected to a single non-geographically distributed LAN **18** only. Applicants therefore submit that Schneider does not teach or suggest an active

telephony call processing host that is connected to both the first segment of the first LAN in the first geographic region and the first segment of the second LAN in the first geographic region and a standby telephony call processing host that is connected to both the second segment of the first LAN in the second geographic region and the second segment of the second LAN in the second geographic region as recited in amended claim 1.

Section 4 of the Official Action states that Shaffer in view of Tester and Schneider does not disclose one IP subnet for the separated segments of a LAN. In an attempt to overcome this substantial gap existing between claim 1 and Shaffer in view of Tester and Schneider, the Official Action introduces Wiget. While Wiget specifically discloses separated LAN segments that have the same IP subnet, it is submitted that Wiget, like Shaffer in view of Tester and Schneider fails to teach or suggest an active telephony call processing host that is connected to both the first segment of the first LAN in the first geographic region and the first segment of the second LAN in the first geographic region and a standby telephony call processing host that is connected to both the second segment of the first LAN in the second geographic region and the second segment of the second LAN in the second geographic region as recited in amended claim 1. Namely, each of Shaffer, Tester, Schneider, and Wiget fails to teach or suggest a primary host and a secondary host that are each connected to two segments of two geographically distributed LANs. At best, the combination discloses that a primary host and a secondary host are connected to a single LAN only.

For at least the reasons stated above, applicants submit that the combination of Shaffer, Tester, Schneider and Wiget fails to teach or suggest the connection to two LANs, much less an active telephony call processing host that is connected to both the first segment of the first LAN in the first geographic region and the first segment of the second LAN in the first geographic region and a standby telephony call processing host that is connected to both the second segment of the first LAN in the second geographic region and the second segment of the second LAN in the second geographic region. Therefore, it is submitted that the rejection of independent claims 1 and 15 under 35 U.S.C. § 103 should be withdrawn.

Claims 2, 5-7, 16-17 and 20-21 depend from independent claims 1 and 15 and recite additional features. As such and for the exact same reasons set forth above, applicants submit that claims 2, 5-7, 16-17 and 20-21 are not made obvious by Shaffer in view of Tester and in further view of Schneider in further view of Wiget. Therefore, it is submitted that the rejection of these dependent claims under 35 U.S.C. § 103 should also be withdrawn.

Claims 3, 4, 18, and 19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaffer in view of Tester, Schneider, and Wiget as applied to claim 1 or 15 above, and further in view of U.S. Patent Application Publication No. 2002/0160810 to Glitho et al., (hereinafter, "Glitho"). This rejection is respectfully traversed.

Claims 3-4 depend from claim 1 and claims 18-19 depend from claim 15. As stated above, the combination of Shaffer, Tester, Schneider, Wiget fails to teach or

suggest an active telephony call processing host that is connected to both the first segment of the first LAN in the first geographic region and the first segment of the second LAN in the first geographic region and a standby telephony call processing host that is connected to both the second segment of the first LAN in the second geographic region and the second segment of the second LAN in the second geographic region. Glitho likewise lacks such disclosure or suggestion. Glitho is instead directed to an intelligent network service control point and method of implementing user services utilizing call processing language scripts. Thus, Glitho fails to bridge the substantial gap existing between the claimed subject matter and the combination of Shaffer, Tester, Schneider, and Wiget. Accordingly, it is respectfully submitted that the rejection of claims 3-4 and 18-19 as being unpatentable over the combination of Shaffer, Tester, Schneider, Wiget, and Glitho should be withdrawn.

Claims 11-14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaffer in view of Tester, Schneider, and Wiget, and further in view of U.S. Patent No. 6,976,087 to Westfall et al., (hereinafter, "Westfall"). This rejection is respectfully traversed with respect to claims 11-14.

Claims 11-14 depend from claim 1. As stated above, the combination of Shaffer, Tester, Schneider, Wiget fails to teach or suggest an active telephony call processing host that is connected to both the first segment of the first LAN in the first geographic region and the first segment of the second LAN in the first geographic region and a standby telephony call processing host that is connected to both the second segment of the first LAN in the second geographic region and the second segment of the second

LAN in the second geographic region. Westfall likewise lacks such teaching or suggestion. Westfall is instead directed to a method and apparatus for configuring packet data networks to supply services to users. One embodiment automatically deploys services onto a network of routers in order to satisfy the requirements of offered service. Thus, Westfall fails to bridge the substantial gap existing between the claimed subject matter and the combination of Shaffer, Tester, Schneider, and Wiget. Accordingly, it is respectfully submitted that the rejection of claims 11-14 as being unpatentable over the combination of Shaffer, Tester, Schneider, Wiget, and Westfall should be withdrawn.

Claims 22 and 23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaffer in view of Tester, Schneider, Wiget, Westfall and U.S. Patent Application Publication No. 2002/0165972 to Chien et al., (hereinafter, "Chien"). This rejection is respectfully traversed.

Claim 22 includes similar patentable aspects recited in claim 1 that are not taught by Shaffer, Tester, Schneider, Wiget, Westfall and Chien. Claim 22 recites a method for routing packets between geographically separate redundant telephony call processing hosts. Claim 22 has been amended to recite that comparing the masked address from step (c) to a plurality of different routing table entries to identify either a first geographically distributed LAN including a first LAN side located in a first geographic region and a second LAN side located in a second geographic region bridged over a wide area network (WAN) or a second geographically distributed LAN including a first LAN side located in the first geographic region and a second LAN side located in the

second geographic region bridged over the WAN and either the first LAN side or the second LAN side of the identified first or second geographically distributed LAN to which the packet should be routed. Support for this amendment is found, for example, on page 16, lines 21-22 of the present specification which states that LAN/side subnet mask **1200** is used to distinguish among the four combinations of the two LANs and the two sides. Claim 22 has also been amended to recite that the first telephony call processing host is connected to both the first LAN side of the first LAN in the first geographic region and the first LAN side of the second LAN in the first geographic region and the second telephony call processing host is connected to both the second LAN side of the first LAN in the second geographic region and the second LAN side of the second LAN in the second geographic region. Support for this amendment is found, for example, on page 9, lines 1-4 of the present specification which states that host **100** and host **104** are interconnected via two LANs, LAN 1 and LAN 2.

As presented above, it is submitted that the combination of <u>Shaffer</u>, <u>Tester</u>, <u>Schneider</u>, <u>Wiget</u>, and <u>Westfall</u> fails to teach or suggest the connection to two LANs, much less an first telephony call processing host that is connected to both the first LAN side of the first LAN in the first geographic region and the first LAN side of the second LAN in the first geographic region and a second telephony call processing host that is connected to both the second LAN side of the first LAN in the second geographic region and the second LAN side of the second LAN in the second geographic region. Applicants further submit that <u>Chien</u> also fails to make any disclosure or suggestion of a second LAN of any type, much less a first and second telephony call processing hosts

that are each connected to both of the first and second LANs. Chien is instead directed to a method and apparatus for reducing traffic over a communication link used by a computer network. Thus, Chien fails to bridge the substantial gap existing between the claimed subject matter and the combination of Shaffer, Tester, Schneider, Wiget, and Westfall. Namely, applicants submit that the combination of Shaffer, Tester, Schneider, Wiget, Westfall, and Chien simply fails to make any teaching or suggestion of a LAN/side subnet that may be used to distinguish among the four combinations of two LANs and their two respective sides in the manner recited in claim 22. Accordingly, it is respectfully submitted that the rejection of claim 22 as unpatentable over the combination Shaffer in view of Tester, Schneider, Wiget, Westfall, and Chien should be withdrawn.

Claim 23 includes similar patentable aspects recited in claim 1 that are not taught by Shaffer, Tester, Schneider, Wiget, Westfall and Chien. Claim 23 has been amended to recite wherein the pair of redundant geographically separate telephony call processing hosts includes a first telephony call processing host and a second telephony call processing host and that the first telephony call processing host is connected to both a first segment of the first LAN in the first geographically separate side and a first segment of the second LAN in the first geographically separate side and the second telephony call processing host is connected to both a second segment of the first LAN in the second geographically separate side and a second segment of the second LAN in the second geographically separate side. Support for this amendment is found, for example, on page 9, lines 1-4 of the present specification which states that host **100**

and host **104** are interconnected via two LANs, LAN 1 and LAN 2. As stated above, applicants submit that the combination of Shaffer, Tester, Schneider, Wiget and Westfall fails to teach or suggest a first telephony call processing host that is connected to both a first segment of the first LAN in the first geographically separate side and a first segment of the second LAN in the first geographically separate side and a second telephony call processing host that is connected to both a second segment of the first LAN in the second geographically separate side and a second segment of the second LAN in the second geographically separate side. Chien likewise lacks such teaching or suggestion. Chien is instead directed to a method and apparatus for reducing traffic over a communication link used by a computer network. Thus, Chien fails to bridge the substantial gap existing between the claimed subject matter and the combination of Shaffer, Tester, Schneider, Wiget, and Westfall. Accordingly, it is respectfully submitted that the rejection of claim 23 as unpatentable over the combination Shaffer in view of Tester, Schneider, Wiget, Westfall, and Chien should be withdrawn.

CONCLUSION

In light of the above amendments and remarks, it is respectfully submitted that the present application is now in proper condition for allowance, and an early notice to such effect is earnestly solicited.

If any small matter should remain outstanding after the Patent Examiner has had an opportunity to review the above Remarks, the Patent Examiner is respectfully

requested to telephone the undersigned patent attorney in order to resolve these matters and avoid the issuance of another Official Action.

DEPOSIT ACCOUNT

Although no fee is believed to be due, the Commissioner is hereby authorized to charge any fees associated with the filing of this correspondence to Deposit Account No. **50-0426**.

Respectfully submitted,

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